

EXHIBIT 4

Li, Sean

From: Li, Sean
Sent: Friday, November 18, 2022 10:21 AM
To: Zheng Liu; Mark Lee; Eric Cohen
Cc: Kazi, Ruby
Subject: RE: Interfocus--new infringing evidence

Zheng, our client has removed the product on both websites.

Thanks,
Sean



Sean Li
(he/him/his)
Partner | Innovations, Information Technology & Intellectual Property (3iP)
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From: Zheng Liu <zheng.liu@rimonlaw.com>
Sent: Friday, November 18, 2022 9:55 AM
To: Li, Sean <SLi@beneschlaw.com>; Mark Lee <mark.lee@rimonlaw.com>; Eric Cohen <eric.cohen@rimonlaw.com>
Cc: Kazi, Ruby <RKazi@beneschlaw.com>
Subject: RE: Interfocus--new infringing evidence

Sean,

We received these this morning. If we have additional evidence, we will send them to you, but unlikely there will be additional ones in the next six minutes. I will ask one of our assistants to send you the deposit photos. The size of the attachments is becoming too big.

Zheng

From: Li, Sean <SLi@beneschlaw.com>
Sent: Friday, November 18, 2022 9:45 AM
To: Zheng Liu <zheng.liu@rimonlaw.com>; Mark Lee <mark.lee@rimonlaw.com>; Eric Cohen <eric.cohen@rimonlaw.com>
Cc: Kazi, Ruby <RKazi@beneschlaw.com>
Subject: RE: Interfocus--new infringing evidence

Thank you, Zheng. The client is working to remove them immediately. Please be mindful that the Court's ordered notice deadlines were yesterday evening and today noon. If there are any other products, please let us know immediately. Also, please provide us the deposit photos for comparison.

Best,
Sean



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From: Zheng Liu <zheng.liu@rimonlaw.com>

Sent: Friday, November 18, 2022 9:15 AM

To: Mark Lee <mark.lee@rimonlaw.com>; Li, Sean <SLi@beneschlaw.com>; Eric Cohen <eric.cohen@rimonlaw.com>

Cc: Kazi, Ruby <RKazi@beneschlaw.com>

Subject: Interfocus--new infringing evidence

Sean,

We found additional images of InferFocus' on websites controlled by the Defendants. We are still comparing them against the copyright registration deposit photos but want to send them to you as early as possible in the morning.

Best regards,

Zheng

Zheng Liu | Partner

RIMÔN PC

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This e-mail is sent by a law firm and contains information that may be confidential or privileged. If you have received this communication in error, please reply to the sender (only) and then please delete this message from your inbox as well as any copies. Thank you.

From: Mark Lee <mark.lee@rimonlaw.com>

Sent: Friday, November 18, 2022 8:42 AM

To: Li, Sean <SLi@beneschlaw.com>; Zheng Liu <zheng.liu@rimonlaw.com>; Eric Cohen <eric.cohen@rimonlaw.com>

Cc: Kazi, Ruby <RKazi@beneschlaw.com>

Subject: RE: InterFocus - Hibobi - Bond

Fine.

From: Li, Sean <SLi@beneschlaw.com>

Sent: Friday, November 18, 2022 8:40 AM

To: Mark Lee <mark.lee@rimonlaw.com>; Zheng Liu <zheng.liu@rimonlaw.com>; Eric Cohen

<eric.cohen@rimonlaw.com>

Cc: Kazi, Ruby <RKazi@beneschlaw.com>

Subject: RE: InterFocus - Hibobi - Bond

Thank you, Mark. We suggest deleting the highlighted language below because what the Court “may” or “need” do seems outside our saying. Let me know if you agree.

“Parties have agreed that Defendants will post a \$200,000.00 bond in lieu of an asset freeze. This moots Plaintiff’s motion for an asset freeze, **and this Court may lift the current order freezing accounts, and no long need rule on that issue..**”



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From: Mark Lee <mark.lee@rimonlaw.com>

Sent: Friday, November 18, 2022 8:28 AM

To: Li, Sean <SLi@beneschlaw.com>; Zheng Liu <zheng.liu@rimonlaw.com>; Eric Cohen <eric.cohen@rimonlaw.com>

Cc: Kazi, Ruby <RKazi@beneschlaw.com>

Subject: RE: InterFocus - Hibobi - Bond

Sean: We suggest slightly different language as follows:

“Parties have agreed that Defendants will post a \$200,000.00 bond in lieu of an asset freeze. This moots Plaintiff’s motion for an asset freeze, and this Court may lift the current order freezing accounts, and no long need rule on that issue..”

From: Li, Sean <SLi@beneschlaw.com>

Sent: Thursday, November 17, 2022 8:37 PM

To: Zheng Liu <zheng.liu@rimonlaw.com>; Eric Cohen <eric.cohen@rimonlaw.com>

Cc: Kazi, Ruby <RKazi@beneschlaw.com>; Mark Lee <mark.lee@rimonlaw.com>

Subject: RE: InterFocus - Hibobi - Bond

Hi Zheng,

Thank you for the proposal. Defendants accept. We propose that the parties insert same language in tomorrow’s filings to avoid any confusion. Please see the language we proposed below. Let us know if you have any suggestions.

Parties have stipulated a \$200,000.00 bond paid by Defendants in lieu of asset freeze. Defendants respectfully request the Court deny the preliminary injunction regarding the asset freeze, including the asset freeze currently implemented by third parties, including but not limited to PayPal and Checkout. Plaintiff does not object.

Thanks,

Sean



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From: Zheng Liu <zheng.liu@rimonlaw.com>

Sent: Thursday, November 17, 2022 7:41 PM

To: Li, Sean <SLi@beneschlaw.com>; Eric Cohen <eric.cohen@rimonlaw.com>

Cc: Kazi, Ruby <RKazi@beneschlaw.com>; Mark Lee <mark.lee@rimonlaw.com>

Subject: RE: InterFocus - Hibobi - Bond

Sean:

Plaintiff proposes \$200,000.00 for a bond in lieu of asset freeze under the TRO.

Best regards,

Zheng

From: Li, Sean <SLi@beneschlaw.com>

Sent: Thursday, November 17, 2022 10:18 AM

To: Zheng Liu <zheng.liu@rimonlaw.com>; Eric Cohen <eric.cohen@rimonlaw.com>

Cc: Kazi, Ruby <RKazi@beneschlaw.com>; Mark Lee <mark.lee@rimonlaw.com>

Subject: RE: InterFocus - Hibobi - Bond

Yes.



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From: Zheng Liu <zheng.liu@rimonlaw.com>

Sent: Thursday, November 17, 2022 10:12 AM

To: Li, Sean <SLi@beneschlaw.com>; Eric Cohen <eric.cohen@rimonlaw.com>

Cc: Kazi, Ruby <RKazi@beneschlaw.com>; Mark Lee <mark.lee@rimonlaw.com>

Subject: RE: InterFocus - Hibobi - Bond

Will 11 am Pacific work?

From: Li, Sean <SLi@beneschlaw.com>

Sent: Thursday, November 17, 2022 9:43 AM

To: Eric Cohen <eric.cohen@rimonlaw.com>; Zheng Liu <zheng.liu@rimonlaw.com>

Cc: Kazi, Ruby <RKazi@beneschlaw.com>; Mark Lee <mark.lee@rimonlaw.com>

Subject: InterFocus - Hibobi - Bond

Hi Eric and Zheng,

Please let us know if you have time for a meet and confer regarding Defendants' bond proposal.

Thanks,

Sean



Sean Li
(he/him/his)

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